

# Follow-Up Report

October 1, 2017

Submitted to the Accrediting Commission for Community and Junior Colleges

> Western Association of Schools and Colleges

## To: Accrediting Commission for Community and Junior Colleges Western Association of Schools and Colleges

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I certify that there was broad participation by the campus community and believe that this report accurately reflects the nature and substance of this institution.

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#### **Report Preparation**

The Los Angeles Community College District takes an integrated approach to accreditation. While each college has its own governance processes for addressing accreditation, all colleges participate in addressing District accreditation recommendations and in ensuring that the District meets all accreditation standards. The main venue for discussing accreditation issues is the District Accreditation Committee. The District Accreditation Committee is comprised of the college Accreditation Liaison Officers, the college faculty accreditation leads, a college president, and representatives from the Educational Services Center (D0.1\_Accreditation Committee Charge). Following the comprehensive site visits, the committee met to review the possible college and District recommendations and to develop a plan for addressing each recommendation.

The committee met over the past year and reviewed progress made on the recommendations. The progress was further communicated to Board of Trustees through the Institutional Effectiveness and Student Success Committee (D0.2 Accreditation Response Plan; D0.3 LACCD Accreditation summary; D0.4 IESS District Accreditation Update). The report addressing the District recommendations was drafted by the leads in each area at the Educational Services Center from the areas of Human Resources, Information Technology, Educational Programs and Institutional Effectiveness, Office of General Counsel, and Finance and Resource Development. The area lead responses were compiled and written in one voice by the Division of Educational Programs and Institutional Effectiveness and provided to the District Accreditation Committee for approval (D0.5 DAC Agenda 5-9-2017).

The final District responses were provided to each college for review and approval through the college governance processes. Each college completed the report by adding the responses to college-specific recommendations and augmenting the District response to reflect the college implementation of district-wide actions. The complete and appended reports were approved through the college approval processes.

Los Angeles Valley College undertook the preparation of its follow-up report through its established Accreditation Steering Committee, consisting of the College President, Vice President of Administrative Services, Vice President of Student Services, Vice President of Academic Affairs/ALO, Dean of Institutional Effectiveness, Faculty Accreditation Chair, Senate President, Faculty Union Chapter President, and Staff Union Chapter President. The committee met as needed between spring 2016 and spring 2017 to craft its response and gather evidence. Following the completion and approval of the college reports, the final content was edited and submitted to the District Office of Institutional Effectiveness. The response to District and college recommendations were presented to the Board Institutional Effectiveness and Student Success Committee on August 23, 2017 (D0.6 IESS Agenda). The Board of Trustees reviewed and approved the nine college reports on September 6<sup>th</sup>, 2017 (D0.7 September Board Agenda). The final reports were provided to the ACCJC with all required signatures following Board approval. All report materials and evidence have been posted on the college and District websites.

#### **Responses to Recommendations**

**District Recommendation 1 (Compliance):** In order to meet the Standard, the team recommends that the District ensure consistent and uniform guidelines for the search and selection of adjunct faculty. (III.A.1)

The District has policies for hiring that are established in Board Rule Chapter X Article III (D1.1 Ch. X - Article III). The previous adjunct hiring process allowed for the development of local processes that were not consistent across all colleges. Following the ACCJC's comprehensive visit, the District Academic Senate (DAS), in collaboration with the Chancellor and the District's Human Resources Division as representatives of the governing board, jointly agreed to a uniform hiring procedure for all adjunct positions. The District Academic Senate approved the hiring process on May 11, 2017. (D1.2 May 2017 DAS Agenda; D1.3 Adjunct Recruitment Process). Other participatory governance groups were consulted as well. The revised adjunct hiring process was included in the HR Guide (D1.4 HR GUIDE) which was approved in September 2017. A Frequently Asked Questions (FAQ) document was developed to assist colleges in the implementation of this new process (D1.5 FAQ Adjunct Hiring Process).

As part of the new process, a centralized web-based adjunct recruitment system of applicant lists by discipline was developed and is maintained by the District Human Resources Division for dissemination to the colleges and other district hiring locations (D1.6 Recruitment Portal). The revised process includes a hiring selection committee with an Equal Employment Opportunity (EEO) officer, for screening and interviewing applicants. The Human Resources Division also developed templates for posting adjunct positions (D1.7 Example Template PT HEALTH (DR-1)). The templates include duty statements, minimum qualifications, and application processes and are accompanied by a style guide to ensure conformity in the appearance of postings. The new process provides consistency for the recruitment and selection of adjunct faculty with the goal of ensuring a diverse and highly qualified lists of applicants. All hiring processes throughout the district are confidential, and all evidence for this section has been de-identified to protect that confidentiality.

The new process was implemented for adjuncts hired for fall 2017. The online application portal includes requests from every college for disciplines in need of adjunct faculty (D1.8 List of Disciplines Posted). The Human Resources Division validated adjunct hiring lists and distributed the lists to department chairs throughout the spring and summer semesters (D1.9 Example Email to Colleges; D1.10 Example De-identified applicant list). Selection committees reviewed the lists through the online portal to determine which candidates to offer interviews (D1.11 Process for Reviewing Applicants). All interviews were conducted as defined in the adjunct hiring process and included faculty and EEO membership. The uniform guidelines were used in the hiring of all new adjuncts for fall (D1.12 New Adjunct Hiring List to date).

Los Angeles Valley College indicated the need to hire adjuncts for over 20 disciplines. Through the new adjunct hiring process, applicant lists were developed and provided to the college, where the lists were reviewed by selection committees to determine which candidates to offer interviews. **District Recommendation 2 (Compliance):** In order to meet the Standard, the team recommends that the District ensure all personnel are systematically evaluated at stated intervals in accordance with the bargaining agreements and Board policies. (III.A.5)

Following the site visit, the Human Resources Division began an analysis of the current evaluation tracking processes. It found that the system did not include the ability to upload the evaluation as a digital record, which left a gap in the tracking mechanism. Additionally, the District enterprise system, SAP, did not include academic personnel as part of the evaluation tracking. This led to paper records that were sometimes incongruent with the SAP system and two separate means of tracking evaluations. The impact was District records sometimes reflected fewer completed evaluations than college records.

The District has completed an update of the SAP system to enhance tracking and congruence in the evaluation process. The system is now used for all personnel (classified and academic employees) as the system of record for evaluations. In addition, the system has been updated to include the ability to upload the evaluation (D2.1 Evaluation Alert System User 3 0 Manual; D2.2 LACCD EASYenhancementsrelease - 3.0). The digitizing of evaluation forms ensures that all official records are in agreement and that the SAP system can serve as the official record. The SAP system can now track the percentage of evaluations (D2.3 Evaluation Report). The system is programmed to track evaluations in accordance with the contractual guidelines in bargaining agreements. The system of submitting digital copies of evaluations for the official record and for tracking purposes went into effect for evaluations due January 1<sup>st</sup>, 2017 moving forward. This process will capture all evaluations as they are due.

All Colleges have implemented the evaluation process developed in the SAP system. As of September 2017, the District has uploaded to the new system 62.6% of employees in accordance with the stated intervals.

**District Recommendation 3 (Compliance):** In order to meet the Standard, the team recommends that the District update the performance evaluations of academic administrators to include the results of the assessment of learning outcomes to improve teaching and learning. (III.A.6)

The Human Resources Division has worked with collective bargaining groups to add Student Learning Outcomes (SLO) and Service Area Outcomes (SAO) language to job descriptions, job duty statements, and evaluation forms. LACCD academic supervisors (Deans) operate under a collective bargaining agreement (D3.1 Local911\_2014-17 Agreement). On June 10, 2016, the union and the District entered into a Memorandum of Understanding to include the results of the assessment of learning and/or service outcomes in the evaluation of all Deans (D3.2 Signed Teamster MOU). The evaluation form was immediately put into practice (D3.3 Deans Evaluation with SLO Assessment).

All unrepresented management and executive level administrators have also had SLO and/or SAO assessment integrated into the evaluation process. The revised evaluation forms ensure that learning and/or service outcomes are a component of the evaluation process (D3.4 Basic Other Academic Administrator; D3.5 FORM HR E-210C LACCD Summary Evaluation of College President Academic Vice Chancellor).

Each college has implemented the new evaluation process for academic supervisors and managers. The process begins with common language in administrative job announcements that makes clear the role of administrators in using learning and/or service outcomes to improve academic and service programs. All colleges has used the revised job description for all new academic administrators (D3.6 Associate Dean, Strong Workforce; D3.7 Dean of Special Programs and Services). All colleges have evaluated current administrators based on the revised job duties and evaluation processes. This includes utilizing the revised evaluation form that mandates a review of the administrators' use of learning and/or service outcomes. All administrative evaluations are up to date and are available in personnel files for review.

**District Recommendation 4 (Compliance):** In order to meet the Standard, the team recommends that the District and colleges develop a comprehensive Business Continuity/Disaster Recovery plan to ensure reliable access, safety, and security. (III.C.3)

The visiting team indicated that the District and the colleges share responsibility for technology resources and that this led to situations in which technology resources and planning were inconsistent across the colleges. As an example, the team noted that while the District Office has onsite and offsite backups, only some of the colleges had offsite backup systems. In addition, business continuity plans were inconsistent as were the technology resources needed to implement such plans. The District has worked to develop a comprehensive Business Continuity plan that is consistent across all colleges and for the District centralized functions. The plan utilizes the California Community College System Office Information Security Center Template as the framework for a robust disaster recovery process.

The plan was developed through the District Technology Committee constituted by all college IT managers and the District Chief Information Officer. Based on the state template and multiple district-wide technology assessments (D4.1 District Technology Assessment Summary, D4.2 CCCCIO Assessment), the committee refined the recommendations to fit the specific staffing, governance, and technology infrastructure of the District. The committee approved a district-wide business continuity and disaster recovery plan on July 14<sup>th</sup>, 2017 (D4.3 LACCD College and ESC IT Systems Backup and Disaster Recovery Standards and Procedures). The plan was codified in Administrative regulation B-37, which was approved by the Chancellor on July 24, 2017 (D4.4 Administrative Regulation).

While the plan puts in place a consistent process for ensuring reliable access, safety, and security of district and college technology and data, the District has worked to further identify improvements in technology systems, hardware, and processes that will offer even further protection and continuity. As part of a district-wide technology project, the Board requested an assessment of college and district technology needs (D4.5 FMPOC 40J Technology Update) and the development of a Strategic Execution Plan (D4.6 Strategic Execution Plan Timeline) that would improve technology systems such that all colleges are operating at the same standard. The plan included improvements of storage systems, firewall security, and servers that was used in the development of the business continuity and disaster recovery plan.

The completed technology assessment indicated a need for enhanced data storage processes. The Strategic Execution Plan included enhancement to data storage that would lead to segregated onsite storage, local offsite storage, and offsite emergency backups (D4.7 Backup Plan Update Presentation and Timeline). The District has already begun implementation of these improvements with the District and each college adopting a new segregated backup storage system that ensures that all data and systems have a backup separated from the general system. These storage systems bring all colleges up to the same standard for security, and training has been provided for college IT employees on the use of the systems (D4.8 Backup Strategy).

The second phase of the back-up plan includes the development of offsite backups for all colleges. The District has sought industry experts in the development of these planned upgrades. As part of an overall technology assessment strategy, the District will be contracting with a consultant to conduct an evaluation of current IT policies and processes at the college and district level (D4.9 LACCD IT Infrastructure and Organization Assessment). This evaluation will include final recommendations for the use of offsite cloud or tape back-ups. The technology solution will be implemented uniformly across all colleges to add another layer of security.

The District also plans to enhance business continuity and minimize downtime through the purchase of additional servers that could be used as a cold site in the event of catastrophic event or as a warm site in the event of minor outages. These servers will allow the district to maintain enterprise functions in the event that the primary datacenter is inoperable. The purchase of these servers is included in the Strategic Execution Plan with funding identified. The technology assessment strategy noted above will assist the District in identifying the most appropriate location for the secondary site. Additionally, the District has already developed performance/product standards for servers (D4.10 Server Standards). The result of these actions will be uniform server functionality across the district and colleges and the ability to mobilize district resources in support of any college in the event of an emergency.

Through initial assessments it has been made clear that there is a need for a greater standardization related to IT systems. The technology assessment strategy will include an evaluation of current IT organizational structure, policies, processes, and staffing at the college and district-level. This evaluation will be used to determine what additional policies, regulations, and processes should be adopted to bring the District to a higher industry standard for IT operations, cyber security, and business continuity.

**District Recommendation 6 (Compliance):** In order to meet the Standard, the team recommends that the District comprehensively responds to the recurring audit findings concerning: 1) the internal control weakness in information technology controls over the areas of security and change management; and 2) the state compliance exceptions related to "To Be Arranged" (TBA) hours attendance documentation and course classifications. (III.D.7) As part of the ongoing efforts to correct audit findings, the District develops corrective action plans. The corrective action plan for technology controls was developed following the 2015 Audit indicating that the District would increase segregation of duties and further implement Security Weaver (D6.1 2014-2015 Audit p.82-84). The segregation of duties issue has been addressed with additional hiring of a Software Systems Engineer who developed and improved the processes related to security and change management. Over the past year, the District Information Technology Team refined internal controls to establish a list of users who should have administrative and other elevated (Super User) access within the district enterprise systems (SAP) (D6.2 LACCD SAP Privileged Access Report). The District has redacted names and usernames for security purposes. Full reports are available upon visit. The team conducted further reviews of roles and implemented processes and procedures to segregate duties. Additionally, the District Information Technology Division established a new process to limit the use of shared user IDs to ensure that access is appropriate to the user's job responsibilities. In August 2016, the District engaged in its regularly scheduled audit. The auditing firm found significant improvements related to technology controls over the areas of security and change management. (D6.3 2015-2016 Audit p.96-98)

Past corrective action plans related to the audit findings for TBA hours have included training with no changes in internal procedures. The District worked to develop a new corrective action plan (D6.4 TBA Validation Process) that involves increased central review and control over the TBA reporting. This plan was shared with Chief Instructional and Student Service Officers in a joint meeting on May 20, 2016, for final revision and approval (D6.5 CIO CSSO Joint Council Agenda 5 20 16). The validation process includes periodic reviews of TBA courses to ensure that required curricular and attendance records are present. While the colleges still retain the autonomy to schedule TBA courses, the District assumes the role of verifying that all state requirements are satisfied prior to submitting final FTES reports. At the end of each semester, the Division of Educational Programs and Institutional Effectiveness will audit attendance records for compliance. Scheduled sections not meeting requirements will not be submitted for apportionment.

The corrective action plan was presented at a districtwide meeting to ensure all personnel involved were aware of the new processes (D6.6 Corrective Action - Audit - August 2016 Presentation). The plan was put into action for the 2015-2016 FTES reporting. All colleges worked with the District to ensure that sections included the correct documentation prior to submission. The external audit report found no deficiencies with TBA documentation and reporting, indicating that the reoccurring finding regarding TBA hours had been addressed (D6.7 2015-2016 Audit p.126-128). One course was identified as being used to address a student time conflict and was not related to the documentation of TBA hours.

**District Recommendation 8 (Compliance):** In order to meet the Standard, the team recommends that the District develop a process to capture the full impact of the District's liability for load banking and to record the liability in the District's financial statements.

(III.D.12)

The District completed an assessment of load banking across all colleges and noted the liability in the financial statements (D8.1 Financial Statements). Through collaboration with the college offices of academic affairs, the District has developed a system that, each semester, requires the colleges to submit required detailed information to calculate the district-wide load banking liability resulting from load banking at the colleges (D8.2 Load Banking Memo, D8.3 Load Banking work sheet 2017). The load banking information will be regularly reported to the Accounting Department and recorded as a liability in the District's books for use in the District's financial statements at the end of the fiscal year.

**District Recommendation 10 (Compliance):** In order to meet the Standard, the team recommends that the Board adopt policies that clearly define the process for the selection and evaluation of the chancellor. (IV.C.3)

In the evaluation of Board policies, the team determined that there were no policies that clearly identified the process for the selection and the evaluation of the chancellor. Board Rule Chapter X, Article III articulates hiring processes, including college presidents. Section 10309 was added to the Board Rule to clearly define the process for the selection of the Chancellor (D10.1 Ch. X - Article III). The revised Board Rule was approved by the Board on March 8<sup>th</sup>, 2017 and is in effect for the next selection process (D10.2 March 8 2017 Board Agenda; D10.3 March 8 2017 Board Minutes).

The evaluation of the Chancellor was added to Board Rule Chapter X Article I, Human Resources Services (<u>D10.4. Ch. X - Article I</u>). Section 10105.13 defines the process of the evaluation of the Chancellor stating:

The Board shall conduct an evaluation of the Chancellor of the District at least annually. Such evaluation shall comply with any requirements set forth in the contract of employment with him/her as well as this policy. The Board shall evaluate the Chancellor using an evaluation process developed and jointly agreed to by him/her and the Board.

The criteria for evaluation shall be based on board policy, the Chancellor's job description, and overall priorities developed in accordance with board policy.

The Board Rule was approved on March 8<sup>th</sup>, 2017 (<u>D10.2 March 8 2017 Board Agenda</u>; <u>D10.3</u> <u>March 8 2017 Board Minutes</u>). The evaluation process goes into effect immediately and will be used in the annual evaluation of the Chancellor.

**District Recommendation 11 (Compliance):** In order to meet the Standard, the team recommends that the Board establish a formal process for approving the review of policies in which no revisions are made and to regularly assess the effectiveness of all policies in fulfilling the District mission. (IV.C.7)

The District has had a long established process for the regular review of policies and Board Rules defined in C-12 (D11.1 Admin\_Reg\_C\_12 Previous Version). The previous process had called for District executive staff to review all Board rules on a triennial basis and to bring all proposed changes to the Board for approval. The procedure did not require the review of Board rules in instances when no changes were recommended. The recommendation from the visiting team stressed the need to revise the process to include a regular review when no changes are recommended. In May 2016, Administrative Regulation C-12 was updated to include the provision that the Board review all policies on a triennial basis regardless of whether changes were recommended (D11.2 Admin Ref C 12). Specifically, the regulation indicates: If the specified designee recommends that no changes be made to a particular rule or regulation,

If the specified designee recommends that no changes be made to a particular rule or regulation, the rule will be noticed at the next scheduled Board meeting for subsequent affirmation. The next scheduled review period for that rule or regulation shall be calendared three years from the current year.

To ensure that all current Board Rules have been reviewed by the Board in the past three years, the Office of General Counsel provided all unchanged Board Rules for approval to the Board on December 7<sup>th</sup>, 2016 (D11.3 Board-Agenda December 7 2016 item C-5; D11.4 Board Minutes December 7 2016). To date, all Board Rules have been reviewed and approved by the Board at least once in the past three years, and the Office of General Counsel will continue its practices of tracking the review of all policies and procedures to ensure that triennial reviews occur. (D11.5 Board Rule Tracking)

The District has also used this recommendation as an opportunity to improve all of its policies through a process of continuous quality improvement. The Office of Educational Programs and Institutional Effectiveness in consultation with the Office of General Counsel will be working toward the adoption of the Community College League of California model policies. The District has developed a crosswalk of the model policies to current policies beginning with Chapter 2 (D11.6 Example Crosswalk) and assigned the revision of District policies to appropriate consultation groups. The District plans on integrating the model policies over the course of the next 18 months and believes that these efforts will provide additional uniformity to the District policies and a greater ability to respond to legislative changes from the state.

**Commission Concern 1:** The Commission discussed the institution-set Standards established by Los Angeles Valley College and, like the team, believes that they are set low. The college should review and consider resetting those standards to a more rigorous level. (Standard I.B.2)

#### **Process and Development**

During the previous academic year (2015-2016), the College's Program Effectiveness and Planning Committee (PEPC) discussed student achievement data and methodology relative to the institution-set standards established in 2013. The committee revised the standard related to persistence (fall-to-fall retention) to include only first-time students and subsequently modified the standard to 41%. PEPC did not finalize any other recommendations to modify the standards at that time, but prioritized completion of this work for early 2016-2017.

Following the spring 2016 ACCJC site visit and the Commission action letter dated July 8, 2016, PEPC approached the data and methodology with the intent of addressing the Commission Concern regarding the rigor of institution-set standards. Specific issues regarding the institution-set standards were not identified in the Team Exit Report or checklist response.

Upon review of the updated data trends and variance, PEPC proposed a revised set of standards that were vetted through the College's shared governance process (<u>C1.1 Summary</u> <u>Document</u>, <u>C1.2 IEC February 7, 2017 Minutes</u>, <u>C1.3 Motion F16-13-Institutional-Set-Standards</u>).

Indicator	2013 Standards	Revised 2016 Standards
Success (Successful Course Completion)	64%	66%
Retention (within course)	84%	84%
Persistence (Fall to Fall - New Students)	41%	43%
Degree Awards (AA, AS, AT, ST) - (count)	722	788
Certificate Awards (CA) (count)	260	690
UC & CSU Transfer	618	702

#### **EVIDENCE APPENDIX**

#### **INTRODUCTION**

D0.1\_Accreditation Committee Charge

D0.2 Accreditation Response Plan

D0.3 LACCD Accreditation summary

D0.4 IESS District Accreditation Update

D0.5 DAC Agenda 5-9-2017

D0.6 IESS Agenda

D0.7 September Board Agenda

### **DISTRICT RECOMMENDATION 1 (COMPLIANCE)**

D1.1 Ch. X - Article III

D1.2 May 2017 DAS Agenda

D1.3 Adjunct Recruitment Process

D1.4 HR GUIDE

D1.5 FAQ Adjunct Hiring Process

D1.6 Recruitment Portal

D1.7 Example Template PT HEALTH (DR-1)

D1.8 List of Disciplines Posted

D1.9 Example Email to Colleges

D1.10 Example De-identified applicant list

D1.11 Process for Reviewing Applicants

D1.12 New Adjunct Hiring List to date

## **DISTRICT RECOMMENDATION 2 (COMPLIANCE)**

D2.1 Evaluation Alert System User 3 0 Manual D2.2 LACCD\_EASY enhancements release - 3.0 D2.3 Evaluation Report

#### **DISTRICT RECOMMENDATION 3 (COMPLIANCE)**

D3.1 Local911\_2014-17 Agreement D3.2 Signed Teamster MOU D3.3 Deans Evaluation with SLO Assessment D3.4 Basic Other Academic Administrator D3.5 FORM HR E-210C LACCD Summary Evaluation of College President Academic Vice Chancellor D3.6 Associate Dean, Strong Workforce D3.7 Dean of Special Programs and Services

#### **DISTRICT RECOMMENDATION 4 (COMPLIANCE)**

D4.1 District Technology Assessment Summary

**D4.2 CCCCIO Assessment** 

D4.3 LACCD College and ESC IT Systems Backup and Disaster Recovery Standards and Procedures

D4.4 Administrative Regulation

D4.5 FMPOC 40J Technology Update

D4.6 Strategic Execution Plan Timeline

D4.7 Backup Plan Update Presentation and Timeline

D4.8 Backup Strategy

D4.9 LACCD IT Infrastructure and Organization Assessment

D4.10 Server Standards

## **DISTRICT RECOMMENDATION 6 (COMPLIANCE)**

D6.1 2014-2015 Audit p.82-84 D6.2 LACCD SAP Privileged Access Report D6.3 2015-2016 Audit p.96-98 **D6.4 TBA Validation Process** D6.5 CIO CSSO Joint Council Agenda 5 20 16 D6.6 Corrective Action - Audit - August 2016 Presentation D6.7 2015-2016 Audit p.126-128

## **DISTRICT RECOMMENDATION 8 (COMPLIANCE)**

**D8.1 Financial Statements** D8.2 Load Banking Memo D8.3 Load Banking work sheet 2017

## **DISTRICT RECOMMENDATION 10 (COMPLIANCE)**

D10.1 Ch. X - Article III D10.2 March 8 2017 Board Agenda D10.3 March 8 2017 Board Minutes D10.4 Ch. X - Article I

## **DISTRICT RECOMMENDATION 11 (COMPLIANCE)**

D11.1 Admin Reg C 12 Previous Version D11.2 Admin Ref C 12 D11.3 Board-Agenda December 7 2016 item C-5 D11.4 Board Minutes December 7 2016 **D11.5 Board Rule Tracking** D11.6 Example Crosswalk

# **COMMISSION CONCERN 1**

C1.1 Summary Document

C1.2 IEC February 7, 2017 Minutes

C1.3 Motion F16-13-Institutional-Set-Standards